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October 27, 2009

Mr. Jim Ussery  
Assistant Director  
Georgia Department of Natural Resources  
Environmental Protection Division  
2 Martin Luther King Jr. Drive, SE Suite 1152 East Floyd Tower  
Atlanta, GA 30334-9000


RE: Plant Washington  
Sandersville, Georgia

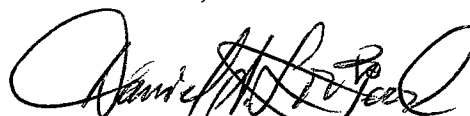
Dear Mr. Ussery:

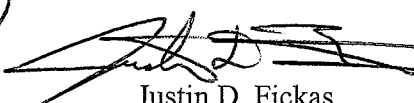
After a review of the draft water withdrawal permits, Air Quality Permit for Plant Washington, and the associated Preliminary Determination documents of the draft Air Quality Permit, on behalf of our client Power4Georgians, LLC (P4G) we are providing comments to these documents as attached to this letter. Also attached to this document is a PE certification attesting to the fact that the Prevention of Significant Deterioration permit application was prepared by or under the direct supervision of a registered Professional Engineer in the State of Georgia, and the Water Management Plant was prepared by or under the direct supervision of a registered Professional Engineer in the State of Georgia.

The attached comments include requested changes to the water withdrawal permits, requested changes to the draft air permit, clarifications on several items included in the draft air permit and determination documents, and point out several noted typographical errors in the draft air permit and determination documents. If you have any questions, please contact me at (770) 421-3569.

Sincerely,  
MACTEC ENGINEERING AND CONSULTING, INC.

  
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Executive Vice President

  
Daniel A. Lovingood  
Project Manager

  
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Senior Engineer

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# Draft Air Quality Permit Comments

The following are noted items for requested changes in the draft air permit.

Condition #

2.13(d) **Filterable PM Averaging Period:** Condition 2.13(d) (Page 8) of the draft permit, in conjunction with Condition 6.2(u) and 7.7 states that compliance with the filterable PM emission limit of 0.012 lb/MMBtu for the main boiler will be demonstrated through PM CEMS on a 3-hr average (rolling). The application proposed compliance demonstrated through use of PM CEMS on a 24-hr block average.

In section 4.3.1 of the Prevention of Significant Deterioration Permit Application, the lack of operating facility experience with utilization of PM CEMS to demonstrate continuous compliance with stringent PM emission limits on a short-term basis was discussed. Also, in a letter submitted to the Georgia EPD dated May 28, 2009 regarding VOC and PM emission limits, the response and variability of PM CEMS, as well as discussions on operational practices (soot blowing, load changes, etc.) that could cause sudden increases in system PM emissions were discussed.

The variables identified in the May 2009 letter will make continuous compliance on a short term basis (3-hr rolling) very difficult if not impossible to achieve. It is recognized that many operational facilities routinely conduct stack testing to demonstrate compliance with filterable PM emission limits, and that these stack tests are conducted over a 3-hr period. However, these stack tests do not account for the operational variability that needs to be accounted for with a system continuously monitoring emissions from a system 24 hours a day 7 days a week.

Therefore, P4G requests that the Georgia EPD consider the longer averaging time as proposed in the permit application (24-hr average) to demonstrate compliance with the facility filterable PM emissions limit while using a CEMS device. The shorter continuous compliance period of 3 hours does not allow sufficient time in monitoring to account for knowable and unavoidable transient conditions that could cause an increase in emissions such as;

- Soot blowing
- Load changes
- Scrubber mist carryover
- Fuel blend changes

- Monitor variability
- Severe changes in ambient conditions

P4G would also like to point out that since the National Ambient Air Quality Standard for PM has been established on a 24-hr average basis, continuous compliance with the PM emissions limits of the facility on a 24-hr average basis should be acceptable.

2.13(e) **PM<sub>2.5</sub> Emission Limit:** Condition 2.13(e) (Page 8) for PM<sub>2.5</sub> currently reads “Total PM<sub>2.5</sub> in excess of 0.0123 lb/MMBtu on a 3-hr average”. P4G requests that the condition read “Total PM<sub>2.5</sub> in excess of 0.01236 lb/MMBtu on a 3-hr average”. The value of 0.01236 is the value which was calculated as BACT and used in the dispersion modeling for Plant Washington.

2.14, 7.6 **Minimum Wet Scrubber Removal Efficiency:** Condition 2.14 (Page 10) states the following;

2.14 The Permittee shall maintain a minimum Sulfur Dioxide (SO<sub>2</sub>) removal efficiency of 97.5 percent on a 30-day rolling average for the Wet Limestone Scrubber.

[40 CFR 52.21(j) and 40 CFR 60.43Da(i)(1) (subsumed)]

Condition 2.14 is acceptable. However, the scrubber removal efficiency requirements are not included in discussions on how the averaging periods (i.e. 30-day rolling average) are derived to demonstrate compliance with the SO<sub>2</sub> emissions limitations. P4G requests adding Condition 2.14 under the requirements of Condition 7.6. Permit language would then read as follows;

*7.6 The Permittee shall determine compliance with the SO<sub>2</sub> emissions limitations in Condition No. 2.13.f, g, h, p, and Condition 2.14 using emissions data acquired by the SO<sub>2</sub> CEMS. The 30-day rolling average (emission rate and efficiency), 12-month rolling average, 3-hour rolling average and 24-hr rolling average shall be determined as follows:*

*[40 CFR 63 Subpart B; 40 CFR 52.21 and 391-3-1-.02(6)(b)1]*

*g. The 30-day average removal efficiency shall be the average of all valid hours of SO<sub>2</sub> removal efficiency data for any 30 successive operating days.*

2.17      **Auxiliary Boiler Hours of Operation:** Condition 2.17 (Page 10) limits the hours of operation of the auxiliary boiler to 876 hours during any twelve consecutive months. While it is understood that this limitation takes effect following official commissioning of the auxiliary boiler, please be aware that the commissioning hours of the auxiliary boiler will be greater during the first year of facility commissioning to support additional equipment checkout and evaluation of facility equipment during the initial startup phase of the facility. This extended run time is necessary in the normal commissioning process of a power plant and also may be necessary if any operational difficulties are encountered during the startup phase of the plant. For this reason, during the first year of operation of the main boiler, the auxiliary boiler may operate more than the 876 hours limitation due to the extended commissioning time.

2.18      **Cooling Tower Compliance Methods:** Condition 2.18 (Page 10) indicates maintaining documentation that a 0.0005% drift rate is guaranteed for the cooling tower, but no Condition was listed (as proposed) for quarterly monitoring of the dissolved solids content of the cooling tower makeup water. Since the PM emissions from the cooling tower are based on both the drift rate of the cooling tower, and the Total Dissolved Solids (TDS) content of the cooling tower makeup water, P4G requests that a condition be added to the draft permit to include a requirement for quarterly monitoring of the TDS content of the cooling tower makeup water, to include additional compliance monitoring for the cooling tower (Emission Units S2 to S35). Condition 2.18 could be modified to read as follows;

*2.18 The Permittee shall install and operate, as BACT for cooling tower (Emission Units S2 to S35), drift eliminators and shall maintain documentation that a 0.0005% drift is guaranteed and conduct analysis of the quality of the cooling tower makeup water each calendar quarter, limited to 3,300 mg/L TDS.*

*[40 CFR 52.21(j)]*

5.2(f)      **Opacity Monitor:** Condition 5.2(f) (Page 13) of the draft permit specifies use of a Continuous Opacity Monitoring System (COMS) on the main boiler. Additional draft permit terms and conditions refer to the opacity monitor. The Preliminary Determination to the draft permit (Page 10) states the following;

*Continuous Opacity Monitoring System (COMS) is required to determine compliance with the opacity standard. However, units that use PM CEMS to meet compliance with PM standard are exempt from COMS requirement. Compliance with the opacity standard is determined through PM CEMS [40 CFR 60.48Da(o) and 40 CFR 60.49Da(u)].*

Therefore, P4G maintains that there is no regulatory basis for requirement of the COMS device. The difficulty in operation of a COMS device in a wet stack is a well documented and recognized issue. Many of the utility facilities now operating wet scrubbers have changed over from COMS to PM CEMS due to the difficulties in operation of COMS devices in a wet stack. The Permit Statement of Basis for the Kentucky Utilities Company – Ghent Generating Station (12/15/05) reads “*Due to wet stack conditions during operation of the wet scrubber system, representative continuous opacity monitor (COM) data cannot be obtained. As a Phase 1 Extension Control Unit (a unit with a wet flue gas control system), 40 CFR 75.14(b) has exempted the unit from the opacity monitoring requirements. To provide assurance of compliance with the applicable PM and opacity limitations, the permittee has proposed to install and operate a Particulate Matter Continuous Emissions Monitoring System (PM-CEMS).*”

Therefore, due to the recognized difficulty in operation of a COMS device following a wet scrubber, the allowed exemption under the New Source Performance Standards (NSPS) for sources that utilize PM CEMS, and the fact that compliance with the filterable PM emission limit of the permit will be demonstrated continuously through use of PM CEMS, P4G requests that the requirement for installation and operation of a COMS unit on the Coal Fired Boiler (S1) be removed.

**6.2(f), (g), (h) Testing Methods for PM, PM<sub>10</sub> and PM<sub>2.5</sub>:** Condition 6.2 specifies that Method 5 or Method 17, in conjunction with Method 202 shall be used for determination of total PM/PM<sub>10</sub> concentrations. With the understanding that the presumption is made that total PM is equivalent to total PM<sub>10</sub>, then P4G requests removal of Condition 6.2(f) as this condition is now ambiguous.

Also, the PM testing methods specified in 6.2(g) and 6.2(h) specify “Method 5 or Method 17”. P4G requests that this permit condition be modified to read “Method 5, **Method 5B**, or Method 17”. Such conditions have been included in permit conditions for other utility coal

fired boilers (i.e. Santee Cooper Cross). Method 5B is an EPA promulgated test method to eliminate interferences from sulfuric acid mist in particulate matter evaluations.

6.2(j) **Testing Methods for Sulfuric Acid Mist:** The application proposed use of Controlled Condensate Method 8A for compliance testing demonstration for sulfuric acid mist. The draft permit states use of EPA Method 8 (Condition 6.2(j), Page 17). Page 46 of the Preliminary Determination states;

*The facility will be required to perform stack test using Method 8. The Division requires the facility to use Method 8 to ensure compliance with the SAM limit, as Method 8 is the method required for SAM as per Division's Procedures for Testing and Monitoring document.*

Method 8 specifies that interferences with the test method include the presence of fluorides and free ammonia, which will be present in the exhaust gas stream of Plant Washington. Method 8A, also called Controlled Condensate Method 8A, eliminates these concerns. Since other coal fired utility boilers have utilized Method 8A for compliance demonstrations with their permitted sulfuric acid mist emission limits, including facilities such as Santee Cooper Cross, TS Power (Newmont), and Wygen II, and the text of Method 8 specifies interferences with conditions that would be expected at Plant Washington, Plant Washington should be allowed use of Method 8A for compliance demonstration for sulfuric acid mist. Use of Method 8A has been granted in other Georgia issued permits (Georgia Pacific Cedar Springs LLC, Permit No. 2631-099-0001-V-02-0, Condition 4.13(h)). P4G requests that Condition 6.2(j) be modified to read;

*Method 8 or NCASI Method 8A shall be used for the determination of sulfur acid mist emissions.*

6.6, 6.8 **Testing Requirements for Small Dust Collectors:** Condition 6.6 and 6.8 contain testing requirements for small dust collector sources (i.e. insertable dust collectors, bin vent filters on silos, etc.). Testing of such emission sources, with small exhaust flow rates, horizontal discharges, etc. can be challenging and require construction of stack extensions and additional apparatus. Also, bin vent filters operate periodically via displaced air into and out of the material storage device (i.e. Pretreatment Soda Ash Silo). These circumstances make testing of such sources under the requirements of the specified test methods difficult, if not

impossible. Due to the inherent difficulty in conducting testing of such sources, P4G requests elimination of Condition 6.6 and modification of Condition 6.8 to read;

*Within 60 days after achieving the maximum production rate at which the sources will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct performance testing on the ~~PRB Conveyor Stackout S46, Illinois # 6 Conveyor Stackout S47, Coal Crusher House S40, Tripper Decker S41, Fly Ash Mechanical Exhausters S43, Fly Ash Silo S37, SO3 Sorbent Silo S36, Mercury Sorbent Silo S38, Pretreatment Soda Ash Silo S44, Pretreatment Hydrated Lime Silo S39~~, for Particulate Matter to verify compliance with Condition No. 2.28 and furnish to the Division a written report of the results of the performance test.*

*[40 CFR 52.21 and 391-3-1-.02(3)]*

6.9      **Scrubbant pH:** Conditions 6.9 includes a condition to establish the minimum scrubbant pH for the wet scrubber (for HF and HCl emissions control) during the initial performance tests. However, modifying these parameters to establish the minimum value for operation to maintain compliance during the initial compliance-testing phase would be unwise, since modifying these parameters improperly during testing could lead to failure of the initial compliance test. Therefore, P4G requests that Condition 6.9 be removed. Since the SO<sub>2</sub> control device (wet scrubber) has been demonstrated to effectively control acid gases, surrogate monitoring of SO<sub>2</sub> will demonstrate ongoing compliance with the permitted HF and HCl emission limits.

7.5, 7.6, etc.      **Discussions of Valid Hours of Emissions Data:** Draft permit conditions in Section 7 discuss "valid hours of ....emissions data". However, there is no clear definition established of what constitutes a valid hour of emission data. P4G requests that permit language be added to define valid hours of emissions data as defined in the New Source Performance Standards (NSPS) regulations.

**The following are noted items for clarification in the draft air permit.**

Condition #

N/A      The Air Pollution Control Device Description for Emission Unit ID No. A3 (Page 3), indicates the use of water sprays for control of emissions from the Bottom Ash Transfer to Bin and from Bin to Truck. These materials will already be wet after transference through the submerged chain conveyor since pyrites from the pulverizers are being sluiced to this conveyor, as illustrated in Figure 2-5 of Page 2-12 of the Prevention of Significant Deterioration Permit Application. Therefore, these materials will already be wet and typically do not require additional spray.

2.27      Condition 2.27 (Page 12) is stated as the following;

2.27 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from vents of Limestone Preparation Building S42, any emissions, which contain PM/PM10 in excess of 0.005 gr/dscf.

[40 CFR 52.21(j) and 40 CFR 60.672(e)(2) (subsumed)]

The permit condition is indicating the Limestone Preparation building as source S42. As described in Section 2, pages 2-8 thru 2-9 of the Plant Washington Prevention of Significant Deterioration Air Permit Application, limestone will be conveyed into a day bin silo located inside of the Limestone Preparation Building. This day bin silo will be equipped with a bin vent filter, indicated as emission point S-42 in Figure 2-3 (Page 2-9) of the application. Therefore, emission point S42 is a bin vent filter located on top of a silo inside of a building, with the vent from the filter discharging outside of the building.

Also, it should be considered that NSPS Subpart OOO exempts from applicability to PM emission limits baghouses that control emissions from only an individual, enclosed storage bin. It is therefore recommended that the condition be modified to read as follows;

***2.27 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the day bin silo vent S42 of the Limestone Preparation Building, any emissions, which contain PM/PM10 in excess of 0.005 gr/dscf.***

***[40 CFR 52.21(j)]***

In conjunction with this comment the Emission Unit description on Page 3 of the draft air permit for source S42 should also read "Limestone Preparation Building **Day Bin Silo**".

The following are noted typographical errors in the draft air permit.

Condition #

- N/A      **Equipment Description – Page 4:** EG1 and EP1 currently read “Diesel Fired”. These equipment descriptions should read “**Ultra Low Sulfur Diesel Fired**” to conform with other equipment descriptions.
- 2.16(c)      **Auxiliary Boiler PM Limit:** Condition 2.16(c) (Page 10) currently reads; “Contain PM/PM<sub>10</sub> in excess of 0.014 lb/MMBtu”. The condition should read “Contain **Filterable** PM/PM<sub>10</sub> in excess of 0.014 lb/MMBtu”.
- 5.2(g)      **Mercury CEMS:** Condition 5.2(g) (Page 15) currently reads “The 1-hour average Mercury emission rates shall also be recorded in pound per MW-hr heat output”. The condition should read “The 1-hour average Mercury emission rates shall also be recorded in pound per MW-hr **electrical** output”.
- 5.3(c)      **Monitoring:** Condition 5.3(c) (Page 15) currently reads” The gross electrical output in MW for the Coal Fired Boiler” The condition should read “The gross electrical output in MW for the **Power Plant**”.
- 6.3(b), 6.4(c)      **Performance Testing for Main and Auxiliary Boiler:** Condition 6.3(b) (Page 18) and 6.4(c) (Page 19) currently reads “Performance tests .... for PM”. These conditions should read “Performance Tests .... for PM/PM<sub>10</sub>”.
- 7.6      **SO<sub>2</sub> Emissions Compliance:** Condition 7.6 currently reads “The Permittee shall determine compliance with the SO<sub>2</sub> emissions limitations in Condition No. 2.13.f, g, h and o”. The condition should read “The Permittee shall determine compliance with the SO<sub>2</sub> emissions limitations in Condition No. 2.13.f, g, h and **p**”.

### **Air Permit Preliminary Determination Document Comments**

The following are noted items for clarification in the air permit Preliminary Determination Documents. Those items listed under PD Page # can be found on the indicated page of the Preliminary Determination Document. Those items listed under App A (Notice of MACT Approval) can be found on the indicated page of the Notice of MACT Approval document.

#### PD Page #

i           **Mercury State BACT Requirement:** The summary description of regulatory requirements does not mention BACT for mercury required under State Rule 391-3-1-.02(ttt). This requirement is noted elsewhere in the determination documents but perhaps should also be indicated in the summary on Page i.

3           **Coal Handling and Limestone Preparation:** 2<sup>nd</sup> Paragraph 2<sup>nd</sup> sentence of Page 3 regarding coal handling states “Coal will be pulled from the active piles via eight grizzly hoppers and feeders to two reclaim conveyors. These emission points will be located underground”. When coal is taken from the active piles via the grizzly hoppers the coal is taken from the bottom of the pile into an underground enclosed structure. The statement should therefore read “Coal will be pulled from the active piles via eight grizzly hoppers and feeders to two reclaim conveyors. **The reclaim conveyors will be located underground.**”

The last sentence of the 5<sup>th</sup> paragraph on Page 3 reads “Limestone preparation area is controlled by a baghouse”. As discussed in clarification of draft permit Condition 2.27, The Limestone Preparation Building is not controlled by a baghouse, the day bin silo located within the Limestone Preparation Building is controlled by a bin vent filter (S42).

50           **EPD Review Mercury Control:** The 2<sup>nd</sup> paragraph of Page 50 states that Michigan DEQ is currently reviewing the Mid-Michigan Energy permit application. The application for that facility was withdrawn in May 2009.

86           **Additional Impacts - Growth:** The 3<sup>rd</sup> paragraph on Page 86 states that 100 to 500 people will be required for the construction phase of Plant Washington. Estimates have indicated that up to 1600 people will be required for the construction phase of the project.

App A (MACT Review) Page#

- 2           **Fuel Use Description:** The fuel use description discussion in the 2<sup>nd</sup> paragraph does not include discussion of fuels with equivalent characteristics of PRB and Illinois #6, as stated in Condition 2.11 of the draft air permit.
- 6           **List of Hazardous Air Pollutants (HAPs):** Table II incorrectly identifies Methyl Ethyl Ketone (MEK) as a HAP. MEK was removed from the HAP list in 2005.
- 10, 14       **Mercury MACT Review:** Table IV, Page 10 lists the Consumers Energy (ASPC) mercury limit as  $14 \times 10^{-6}$  lb/MW-hr. The value listed in the draft permit for the site is  $7.9 \times 10^{-6}$  lb/MW-hr. Page 14 states that Michigan DEQ is currently reviewing the Mid-Michigan Energy permit application. The application for that facility was withdrawn in May 2009.
- 25           **Acid Gas MACT Floor:** The first paragraph of Page 25 under Applicant's Proposal states "Very little information is available from EPA on HCl and HF emissions from coal fired power plants". The Prevention of Significant Deterioration permit application discussed the limited data available to evaluate the comparative performance of control technologies. EPA documents which discuss emissions of acid gases from utility coal fired boilers were reviewed and discussed in the permit application (i.e. Utility Report to Congress - 1998). The statement should read "Very little information is available from the EPA regarding the effectiveness of control technologies for HF and HCl".
- 26           **Beyond the Floor:** The 2<sup>nd</sup> paragraph of Page 26 (under Beyond the Floor) states "Plant Washington provided basic cost analysis on adding a WESP system to the facility". Also, it is stated that the environmental impacts "specifically would place greater demands on the limited water supply in the region". Page 26 is under the "Applicant's Proposal" section but the application made no such statement regarding greater demands on the limited water supply.
- 30           **Organic HAPs:** Table XVI on Page 30 incorrectly lists the Surrogate VOC monitoring limit for the John W. Turk Jr. site as 0.0025 lb/MMBtu, when the Arkansas DEQ 112(g) determination was 0.00078 lb/MMBtu for the site. P4G conducted an evaluation of the 112(g) emission limit (0.00078 lb/MMBtu) for the John W. Turk Jr. site, and submitted the results of

that evaluation to the Georgia EPD in the VOC/PM response letter submitted by P4G on May 28, 2009. That evaluation determined that the emission limit derived for the John W. Turk Jr. site should not be considered for Plant Washington.

The BACT VOC emission limit for the John W. Turk site was determined to be 0.0036 lb/MMBtu. However, the Arkansas DEQ determined that the MACT organic HAP compliance monitoring method for the John W. Turk Jr. facility should be VOC stack compliance testing with a limit of 0.00078 lb/MMBtu. Plant Washington will more effectively monitor and control organic HAPs (MACT) through continuous monitoring of CO emissions. This fact, combined with questions of reliability of the testing data on which the limit of 0.00078 lb/MMBtu was derived, and the typical level of NOx emissions from the emission source on which the 0.00078 lb/MMBtu limit was derived, it was determined that the data on which the 112(g) limit of 0.00078 lb/MMBtu was derived should not be used as a basis for assessment of emission limits for Plant Washington.

37 **Acid Gas Auxiliary Boiler:** The EPD Review states in several places that EPD “partially agrees with Plant Washington’s MACT floor analysis for inorganic HAPs”. However, no clarification on why EPD partially agrees with the MACT floor analysis is given.

40 **MACT Approval Fuel Use Discussion:** Page 40 of the MACT Approval document, under Proposed MACT limits and Requirements states the following;

*(5) These boilers are permitted to burn sub-bituminous coal (Powder River Basin, or PRB), or up to a 50/50 blend of sub-bituminous and bituminous coal (Illinois #6), as fuel. Ultra low sulfur diesel fuel can be used for startup in the coal-fired boilers. The use of any other substances as fuel is prohibited without prior written approval from the Division.*

This differs with the condition in the draft permit that allows use of equivalent coals (Page 8 Condition 2.11).

*2.11 Except as provided in Condition No. 2.12, the Permittee shall only fire sub-bituminous coal (Powder River Basin, or PRB coal), or up to a 50/50 blend (by weight) of sub-bituminous and bituminous coal (Illinois #6) in the Coal Fired Boiler S1. Firing of bituminous and*

*subbituminous coals with equivalent characteristics of PRB and Illinois #6 is permitted. [40 CFR 52.21(j) and 391-3-1-.02(2)(g)(subsumed)]*

The draft permit condition 2.11 also does not reference the MACT sections of the CFR (40 CFR Part 63). P4G requests striking of the last sentence of item (5) of the Notice of MACT Approval as shown;

*(5) These boilers are permitted to burn sub-bituminous coal (Powder River Basin, or PRB), or up to a 50/50 blend of sub-bituminous and bituminous coal (Illinois #6), as fuel. Ultra low sulfur diesel fuel can be used for startup in the coal-fired boilers. ~~The use of any other substances as fuel is prohibited without prior written approval from the Division.~~*

The following are noted typographical errors in the Preliminary Determination Documents. Those items listed under PD Page # can be found on the indicated page of the Preliminary Determination Document.

PD Page #

- 75            **Monitoring Requirements:** Section i at the top of Page 75 reads  
“Instrumentation to read the gross electrical output of the boiler”  
Should read;  
“Instrumentation to read the gross electrical output of the **power plant**”
- 80            **Modeling Results Table 6-4:** The PM<sub>10</sub> annual modeled value is incorrect and should read 0.8613 instead of 0.4613.
- 81            **NAAQS and Increment Modeling:** The second paragraph 1<sup>st</sup> sentence has a statement that reads; “all sources located more than 50 kilometers from the plant were excluded from the analysis”. This statement should read “**all sources located more than 50 kilometers outside the SIA were excluded from the analysis**”.
- 87            **General Typographical Error:** The words “in some” from the end of the second sentence at the top of the page should be removed.

## Draft Water Withdrawal Permit Comments

The comments provided below focus primarily on requesting changes that clarify the language in the permits to indicate that a portion of the groundwater withdrawals (0.12 mgd) are allowed at all times, while the 16.0 mgd groundwater withdrawals will alternate with the 16.0 mgd surface water withdrawals.

## **Groundwater Withdrawal Permit**

### Condition #

- 17      **Special Condition 17:** P4G requests a revision to Special Condition 17 to read: "Groundwater will be considered as a backup source to surface water specifically for *the refilling of on-site storage ponds*, cooling water and power plant process water, up to the limits..."
- 18      **Special Condition 18:** P4G requests a revision to Special Condition 18 to read: "Groundwater withdrawals up to the limits shown on page one - *section a* (0.120 mgd monthly and annual average) are allowed..."
- 20      **Special Condition 20:** P4G requests a revision to Special Condition 20 to replace the reference to "the 30-day storage pond" with "*the on-site storage ponds*."

## **Surface Water Withdrawal Permit**

### Condition #

- 5      **Special Condition 5:** P4G requests a revision to the last sentence of Special Condition 5 to read: "The withdrawal limits on page one of the Permit for the raw water withdrawal from the Oconee River and the withdrawal limits on page one - *section b* (16.000 mgd monthly and annual average) of the Groundwater Use Permit No. 150-0026 shall not be added together."
- 6      **Special Condition 6:** P4G requests a revision to Special Condition 6 to read: "Groundwater withdrawals up to the limits *on page one - section a* (0.120 mgd monthly and annual average) of the Groundwater Use Permit No. 150-0026 are allowed at all times for designated sanitary facilities, boiler water and other process needs."

## PE Certifications

## CERTIFICATION

I certify that I am a registered professional engineer licensed to practice in the State of Georgia. I further certify that the Best Available Control Technology determinations and the Maximum Achievable Control Technology determinations as well as the balance of the Plant Washington Prevention of Significant Deterioration Air Permit Application filed on January 17, 2008, for Power4Georgians, LLC, and as subsequently amended, were prepared by myself or by a subordinate working under my direction. I have also affixed my Professional Engineer's Stamp to this certification.

By



Date

October 27, 2009

Professional Engineer's Stamp



## CERTIFICATION

I certify that I am a registered professional engineer licensed to practice in the State of Georgia. I further certify that the Water Management Plan filed on January 17, 2008, for Power4Georgians, LLC, and as subsequently amended, was prepared by myself or by a subordinate working under my direction. I have also affixed my Professional Engineer's Stamp to this certification.

By

Frederick K. Marotte

Date

October 27, 2009

Professional Engineer's Stamp

